

## **EXHIBIT 6**

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

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SUSAN COONEY,

No. 04-11572JLT

Plaintiff,

vs.

SAYBROOK GRADUATE SCHOOL  
AND RESEARCH CENTER and  
MAUREEN O'HARA, Individually,

COPY

Defendants.

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Deposition of

MAUREEN O'HARA

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Monday, March 13, 2006

NOTICING ATTORNEY: PAUL W. MORENBERG

REPORTED BY: JANICE M. JOBE, CSR NO. 4734

GOLDEN GATE REPORTERS LLC  
35 Mitchell Boulevard, Suite 8  
San Rafael, CA 94903-2010  
(415) 491-4611 \* 1-800-442-4611  
FAX (415) 491-4635

email: ggr35@depos.com

web: <http://www.depos.com>

1 A. It was earlier than that. It was shortly after  
2 he arrived in '96, so it was in the fall of '96.

3 Q. I know that at some point Dr. Malone passed  
4 away. Do you recall the time frame of that?

5 A. It was while Jerry Bush was still alive, so it  
6 would have been '98, maybe early '98.

7 Q. And, unfortunately, Dr. Bush also passed away.  
8 What's the approximate time frame when he died?

9 A. I think he died in the spring of 1999.

10 Q. You mentioned the faculty review process. Can  
11 you tell me a little more how that worked; were there  
12 faculty committee meetings where you were interviewed?

13 A. Yes, I was interviewed by the entire faculty.

14 Q. And was that one meeting or several meetings?

15 A. As I recall, it was one meeting.

16 Q. Do you remember when that was?

17 A. No, I don't recall when that was.

18 Q. You came to Saybrook in or about February 1997?

19 A. Right.

20 Q. Was it well before that or right before it that  
21 you met with the faculty?

22 A. It was the fall of '96, sometime between when  
23 Jerry Bush contacted me and when I was made the offer.

24 Q. And how many people participated in that  
25 faculty committee meeting?